

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES of AMERICA :  
: CRIMINAL NO.  
vs. :  
: ASIM FAREED :  
: Defendant :  
Defendant :

**INFORMATION**

**THE UNITED STATES CHARGES:**

**INTRODUCTION**

At all times relevant to this Indictment

1. ASIM FAREED was a citizen and resident of the United States. ASIM FAREED was Vice President of COMPASS LOGISTICS INTERNATIONAL, a shipping business with offices in Somerset, New Jersey. The Somerset, New Jersey branch of COMPASS LOGISTICS INTERNATIONAL was managed by ASIM FAREED. COMPASS LOGISTICS INTERNATIONAL was in the business of shipping goods to customers overseas.

2. Pursuant to United States law and regulation, exporters and shippers or freight forwarders were required to file certain forms and declarations concerning exports of goods and technology from the United States. Typically, those documents were filed electronically through the Automated Export System (“AES”) managed by the United States Department of Homeland Security (“DHS”), Customs and Border Protection. A Shipper’s Export Declaration (“SED”) was an official document submitted to DHS in

connection with export shipments from the United States. These forms were used by the United States Bureau of Census to collect trade statistics and by the Bureau of Industry and Security (“BIS”), Department of Commerce, for export control purposes. The required information to be provided included both the country of destination and the true identity of the end-user for the items to be exported.

**COUNT 1**

3. Paragraphs 1 and 2 of this Indictment are re-alleged in this Count, as if fully set forth herein.

4. Beginning on or about 2013, and continuing to the date of this indictment, both dates being approximate and inclusive, in Lackawanna County, within the Middle District of Pennsylvania, and elsewhere the Defendant,

**ASIM FAREED,**

did knowingly and willfully conspire and agree with persons known and unknown to the United States to knowingly and willfully give a materially false statement to the United States.

**OBJECTS**

5. The objects of the conspiracy were:

a. to conceal from the United States companies and the United States Government the true destination and end-users of U.S.-origin goods.

- b. to make a financial profit for the defendants; and,

**MANNER AND MEANS**

6. It was a part of the conspiracy and agreement that the defendants would use deceit, craft, trickery and dishonest means, in an effort to defraud the United States by interfering with and obstructing the lawful government functions of the Department of Homeland Security and the Commerce Department, whereby the defendant attempted to ship and export goods and services from the United States while providing false and fraudulent invoices, thereby causing shippers to fail to file and file false and misleading SED and AES information.

**OVERT ACTS**

7. In furtherance of the conspiracy and to effect the objects of the conspiracy, ASIM FAREED and the co-conspirators took the following overt acts, among others:

- a. On or about December 11, 2013, M. G. K. sent an email requesting a quote to purchase from the United States, stating: "Dynamic Shear Rheometer (DSR) from Bohlin Instruments Company (I have found it in Malvern website but the brand seems to be related to Bohlin) – Pressure Aging Vessel (PAV) from Humboldt company – Bending Beam Rheometer (BBR) from Humboldt company."

- b. On or about January 12, 2014, M. G. K. sent an email to advise that the company she works for is "[A.] [I.] Co., No. Tehran – Iran," and that she had received

confirmation from her customer for an order of the Pressure Aging Vessel (PAV) and Bending Beam Rheometer (BBR) made by Humboldt.

c. On or about February 12, 2014, M. G. K. caused a wire transfer in the amount of 25,669.00 USD in partial payment for the PAV and BBR, to be sent from “STRONG VISION TRADING CO LLC, OFCE NO. 5 AL KHBESE ST MALIK HANA, UBAID AL HANA DUBAI PO BOX 5536” to “J P MORGAN CHASE BANK, NEW YORK.”

d. On or about July 10, 2014, M. G. K. sent an email indicating that “the new US company that is going to pick up the cargo at your side is... COMPASS LOGISTICS INTERNATIONAL ...”

e. On or about July 30, 2014, ASIM FAREED sent an email indicating that the shipment is going to Iran.

f. On or about August 1, 2014, ASIM FAREED, conducted a meeting at the COMPASS LOGISTICS INTERNATIONAL office located in Somerset, New Jersey in order to discuss the shipment of the PAV and BBR from the United States to Iran. During this meeting ASIM FAREED advised those present that in order to accomplish the shipment, documents would need to be prepared naming a false and fraudulent end user, to accompany the shipment and to be filed with the government. ASIM FAREED was also advised that the shipment would originate in Blakeslee, Pennsylvania and agreed that his company would pick the shipment up from that location.

g. On or about August 1, 2014, ASIM FAREED caused a “Shipper’s Letter of Instruction” to be created, indicating that the shipment was originating in Blakeslee, Pennsylvania and falsely naming “Sabah Tech – LLC, Suite 302, Juma Khalifa Al Mehaira Bldg, Deira Frij Al Murar, Deira Dubai, UAE” as the ultimate consignee for the shipment.

All in violation of Title 18 United States Code, Section 371.

UNITED STATES ATTORNEY  
PETER J. SMITH

Todd K. Hinkley  
By: Todd K. Hinkley  
Assistant U.S. Attorney

Dated: May 17, 2016